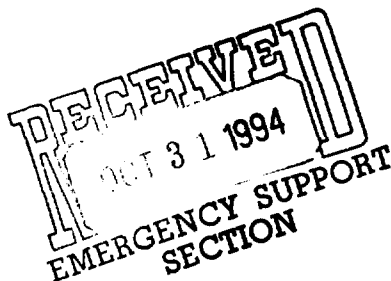


REVERE

COPPER AND BRASS INCORPORATED



Via Fed Ex
October 27, 1994

Linda Beasley, Enforcement Specialist
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Conservation Chemical Company of Illinois, Inc. (the "Site")
Gary, Indiana

Dear Ms. Beasley:

Your letter to "Revere Copper & Brass, Inc." in Clinton, Illinois has been forwarded to me from Corning Incorporated for a response.

Assuming that Andrea Kojm Thomas was correct in her assertion (contained in a letter dated October 19, 1994, a photocopy of which is enclosed) that Corning Incorporated did not assume liability for the Site, please note the following facts:

Revere Copper and Brass Incorporated is a much smaller and far different company than it was in the 1980s. The bulk of Revere's assets consist of real estate held for investment, consisting of vacant land adjacent to a former Revere plant in Louisiana, a closed manufacturing plant in Massachusetts, and an interest in a shopping center in New Jersey. These real estate holdings are illiquid and are not presently generating income. The Louisiana and Massachusetts properties are for sale, and have been for sale for some time. In summary, the liabilities of Revere Copper and Brass Incorporated substantially exceed its assets.

Linda Beasley, Enforcement Specialist
United States Environmental Protection Agency
October 27, 1994
page 2

Also, in October 1982, **Revere** filed for Chapter 11 bankruptcy protection. Revere's plan of reorganization **was confirmed in the summer of 1985**. Therefore, responsibility, if any, for shipments of **hazardous materials** sent to the Site was discharged by the bankruptcy filing.

Any further contact on this **matter** should be directed to:

Amy H. B. Annis, Esq.
Revere Copper and **Brass** Incorporated
28 Boundary Street
Plymouth, MA 02360
(telephone) 508 746-1000
(fax) 508 747-4589

Very truly yours,

A handwritten signature in black ink, appearing to be 'A. Annis', written over a horizontal line.

Amy H. B. Annis
Attorney

cc: Murray J. Swindell (of letter **only**)
Neil B. Eisenband (of letter **only**)

Corning Incorporated
Corning, New York 14831
607-974-9000
fax 607-974-6135

Legal Department

cc MS
ABE

October 19, 1994

COPY

CORNING

Cynthia N. Kowakani, Esq.
United States Environmental
Protection Agency
Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Conservation Chemical Company of Illinois, Inc.
Site: Gary, Indiana

Dear Ms. Kowakani:

Please take notice that Corning Incorporated was improperly forwarded your General Notice of Potential Liability letter, which has now been properly directed to Revere Copper & Brass, Inc.

EPA Region V disclosed that the captioned site operated from the 1970s until its closure in 1984. As Corning Incorporated did not purchase the Clinton, Illinois facility until 1988, and because it did not assume potential Superfund environmental liability, I have forwarded your notice letter directed to Revere Copper & Brass, Inc. to the following contact:

Amy Annis, Esq.
Revere Copper & Brass Incorporated
28 Boundary Street
Plymouth, MA 02360

Please revise your mailing list accordingly. Also please feel free to contact me directly should you have any questions at (607) 974-8134.

Very truly yours,

Andrea Kojm Thomas

Andrea Kojm Thomas
Assistant Counsel

akt:br

cc: Amy Annis, Esq.